



Bristol Bay Native Corporation

Enriching Our Native Way of Life

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April 25, 2000

Eric Taylor,
Area Plans Coordinator
AK Dept. of Transportation & Public Facilities
3132 Channel Drive
Juneau, Alaska 99801-7898

Subject: DOT&PF's Airport Improvement Analysis Technical Memorandum

Dear Mr. Taylor:

We received copies of the Lake and Peninsula Borough's (L&PB's) 4/10/2000 letter and the Bristol Bay Native Association's (BBNA's) 4/18/2000 letter to you regarding the DOT&PF's March, 2000 "Airport Improvement Analysis, Technical Memorandum ("Memorandum")." We tried to keep an objective frame of mind about the subject Memorandum until we were able to read it.

We have since read the Memorandum. Though we applaud your efforts to devise a strategy that addresses the Bristol Bay region's aircraft transportation needs over the next 20 years, we believe that there are several fundamental flaws in the Memorandum's presuppositions.

The first is that the Bristol Bay villages are relatively dispersed over a large region compared to the Yukon/Kuskokwim villages--the "Calista" region. Most of the 56 Calista region villages are concentrated along two of the largest rivers in Alaska--the Yukon and Kuskokwim Rivers. These rivers serve as the region's carotid arteries for barge-delivered fuel, non-perishable food, and construction-material shipments.

The Bristol Bay region, since it has fewer communities scattered on more (and smaller) river systems, does not enjoy such "barge-shipment economies of scale" that the Calista region may enjoy. The shallow Bristol Bay rivers call for small landing-craft-type vessels to lighter crucial fuel and bulky goods from one village to the next. For example, fuel delivered to Dillingham is off-loaded onto small vessels for delivery up the Wood River to Aleknagik, or up the Nushagak River to Portage Creek, Ekwok, New Stuyahok, and Koliganek.

And, unlike the Calista region, the Bristol Bay region can boast such claims as being home to the "Nation's Largest State Park," the "Nation's Largest Concentrations of Brown Bears," and the "World's Largest Wild Salmon Runs," to name a few. These natural distinctions have served to draw an ever-increasing amount of tourists to the Bristol Bay region. This tourism pressure will necessitate the need for longer airports in the region.

The second fault we see in your presumptions is that your visitor and cargo statistical numbers, as shown on Table 6 of the Memorandum, do not appear to be accurate. For example, the total weekly "poundage" deliveries of passengers and cargo to New Stuyahok, according to Table 6 of the Memorandum, is listed as 1,172 pounds per week. Ivanof Bay's figure is listed as 2,765 pounds per week--136% more than New Stuyahok. New Stuyahok has a population of 475 and Ivanof Bay has a population of 29 (source: Department of Community and Economic Development web site).

Since I have traveled to New Stuyahok numerous times (during late summer and during winter), and since I have seen the sheer number of passenger and cargo flights arriving regularly, this figure seems extraordinarily low to me. To get a better feel about the actual airplane passenger and cargo flight activity to New Stuyahok, Paul Roehl of BBNC's Land Department made a call yesterday to Leon Braswell, owner/operator of Mulchatna Air, Inc. The Koliganek/New Stuyahok/Ekwok flights legs essentially comprise Mulchatna Air's "milk run;" i.e., approximately 89.75% of the food on Mr. Braswell's table is there because of his routine flights to and from these villages.

When Paul advised Leon of the 1,172 pounds/week total demand listed on the Memorandum, Mr. Braswell remarked that that figure was "way too low." Mr. Braswell said that there are about 10 Dillingham-based air taxis that service New Stuyahok daily, including Mulchatna Air. In Mr. Braswell's estimation, these air taxis make about 19 trips/day to New Stuyahok (Mr. Braswell currently averages 3 trips/day himself--he makes more daily trips during the busy summer and fall months). Mr. Braswell's usual load per trip to New Stuyahok consists of 4 passengers (@ roughly 165 pounds apiece) and about 200 - 250 pounds of cargo (most New Stuyahok residents shop for groceries while in Dillingham), for a total of between 860 - 910 pounds per trip.

Mr. Braswell alone accounts for about 2,700 pounds of passengers and cargo **per day**. Using a more conservative number of 800 pounds of passengers and cargo per trip times 19 trips per day yields a total of 15,200 pounds per day. This product times 7 days/week results in a new figure of 106,400 pounds per week--more than 90 times the 1,172 pounds per week figure used in Table 6. Factor in the by-pass mail deliveries to New Stuyahok (consisting mostly of perishable food items) and the poundage figure climbs even higher. Though this may have been a lengthy example, we believe that more accurate, empirical evidence should be used when calculating the weight of passengers and cargo being flown to each of the Bristol Bay villages. Given the New Stuyahok example, one would question the validity of the other figures on Table 6.

The third problem we see with the presumptions of the Memorandum concerns safety and economics. From both the safety and economic standpoints, we would like to see

more 5,000-foot runways constructed in the Bristol Bay region. A critically-injured patients chances of survival would increase markedly if he is loaded onto a larger, professionally-staffed medical-evacuation airplane that takes him directly to Anchorage. Currently, critically-injured patients in outlying villages have to squeezed into a Cessna 207 for a long trip to Dillingham.

From an economic standpoint, many Bristol Bay residents could enjoy the lower food, fuel, and supply prices brought on by the shipping economies of scale. For example, the air-cargo shipping costs (per pound) for peaches, milk, and nails would be much lower if these items were flown in a C-130 Hercules directly to a village from Anchorage than they would be if these items were purchased in Dillingham, then flown to the village in a Cessna 207 (because of the price mark-ups and the double-handling of the products).

Lastly, we feel that the DOT&PF should plan to construct 5,000-foot runways because of the high mobilization and de-mobilization costs. Instead of bringing equipment to and from a village twice--once to construct a 3,300-foot runway, and the second time to lengthen it to 5,000 feet--it would cost much less and be more convenient to make the trip only once.

The L&PB and BBNA raise some other valid points about the short-comings of the Memorandum. Perhaps you can consult with the various regional organizations and the individual villages in Bristol Bay to craft a more practical and plausible strategy.

We appreciate the opportunity to comment on your Memorandum.

Sincerely,



Tom Hawkins
Sr. Vice-President & Chief Operating Officer

cc: Walt Wrede, L&PB
Terry Hoefflerle, BBNA
Robert Clark, BBAHC
Leon Braswell, Dillingham